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April 17, 2007

57739-000020

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 06-150 (Service Rules for the 700 MHz commercial bands)

Dear Ms. Dortch:

On April 16, 2007, representatives of multiple parties supporting the Balanced Consensus Plan for the 700 MHz auction of commercial spectrum participated in **two** separate telephone calls to Bruce Gottlieb, legal advisor to Commissioner Copps and Angela Giancarlo, legal advisor to Commissioner McDowell to discuss the above-referenced proceeding.

The parties and their representatives participating on the conference call with Bruce Gottlieb were: (1) MetroPCS Communications, Inc. ("MetroPCS"), represented by Mark Stachiw, Senior Vice President, General Counsel and Secretary and Carl Northrop and Michael Lazarus of Paul, Hastings, Janofsky & Walker LLP; (2) United States Cellular Corporation ("US Cellular"), represented by George Wheeler of Holland & Knight, LLP; (3) Aloha Partners, L.P. ("Aloha Partners") represented by Charley Townsend, President and Tom Gutierrez of Lukas, Nace, Gutierrez & Sachs, Chartered; (4) The Blooston Rural Carriers ("Blooston"), represented by D. Cary Mitchell of Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP; (5) Rural Cellular Association, represented by David Nace of Lukas, Nace, Gutierrez & Sachs, Chtd.; and (6) Corr Wireless Communications, LLC ("Corr Wireless") represented by Don Evans of Fletcher, Heald & Hildreth, PLC.

The parties and their representatives participating on the conference call with Angela Giancarlo were: (1) MetroPCS, represented by Mark Stachiw, Senior Vice President, General Counsel and Secretary and Carl Northrop of Paul, Hastings, Janofsky & Walker LLP; (2) Alltel Corporation, represented by Glenn Rabin, Vice President, Federal Communications Counsel; (3) Dobson Communications Corporation, represented by Tom Coates; (4) Vermont Department of Public Service, represented by Christopher Campbell, Telecommunications Director; (5) Leap Wireless International, Inc., represented by James Barker of Latham & Watkins LLP; (6) National Telecommunications Cooperative Association, represented by Jill Canfield, Senior Regulatory Counsel, Legal & Industry; (7) Aloha Partners, represented by Charley Townsend, President and Tom Gutierrez of Lukas, Nace, Gutierrez & Sachs, Chartered; (8) Blooston, represented by D. Cary Mitchell of Blooston, Mordkofsky, Dickens, Duffy

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& Prendergast, LLP; (9) Rural Cellular Association, represented by David Nace of Lukas, Nace, Gutierrez & Sachs, Chtd; and (10) Union Telephone Company, represented by Kevin Cookler of McDermott Will and Emery LLP.

The oral presentations in these conference calls were consistent with the pleadings and *ex partes* presentations filed on behalf of the above parties in the above-referenced proceedings. The parties stressed the importance to regional and smaller carriers of having service areas that are smaller than regional economic area groupings ("REAGs") available at auction, to enable such carriers to remain competitive with the largest carriers, as well as meet 4G spectrum needs. In addition, the above participants requested that the Commission make the following changes in the proposed 700 MHz band plan:

1. In the lower band, license one paired frequency block on a CMA basis, and one paired frequency block on a EA basis. The remaining unpaired spectrum should be licensed on a REAG basis as is the case in the current rules.
2. In the upper band, subdivide the 20 MHz frequency block into two 10 MHz paired frequency blocks.
3. After subdividing the upper hand frequency block, make one of the two subdivided frequency blocks available on a geographic area smaller than a REAG.¹

This letter is being filed pursuant to Section 1.1206 of the Commission's rules. 47 C.F.R. § 1.1206.

Kindly refer any questions in connection with this letter to the undersigned.

Respectfully submitted,

/s/ Carl W. Northrop

Carl W. Northrop
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: (via email) Bruce Gottlieb
Angela Giancarlo

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¹ The balanced consensus plan advocated allocating two CMA frequency blocks, one of which would be in the upper band.